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2 Nevada Bar No. 9800  
3 TIMOTHY J. LEPORE  
4 Nevada Bar No. 13908  
5 **PHILLIPS, SPALLAS & ANGSTADT LLC**  
6 504 South Ninth Street  
7 Las Vegas, Nevada 89101  
(702) 938-1510

6 *Attorneys for Defendant*  
7 *Wal-Mart Stores, Inc.*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 RUTH ANN STEDEFORD,

11 Plaintiff,

12 v.

13 WAL-MART STORES, INC., and DOES I-X  
14 and ROE CORPORATIONS I-X, inclusive,

15 Defendants.

Case No.: 2:14-cv-01429-JAD-PAL

**STIPULATION ESTABLISHING  
PARAMETERS FOR FRCP 34 SITE  
INSPECTION BY PLAINTIFF RUTH  
ANN STEDEFORD**

16 COME NOW, Plaintiff RUTH ANN STEDEFORD, by and through her counsel of record, the  
17 law firm of INJURY LAWYERS OF NEVADA, and Defendant WAL-MART STORES, INC.  
18 (“Walmart”), by and through its counsel of record, the law firm of PHILLIPS, SPALLAS &  
19 ANGSTADT LLC, and pursuant to the provisions of FRCP 34(a)(2)(b)(1), the parties agree, and  
20 hereby stipulate, that the inspection shall be conducted within the following parameters:

22 At 11:00 a.m., on October 28, 2015, at the premises of Walmart Store No. 5101, located at 300  
23 South Highway 160, Pahrump, Nevada, Defendant shall permit Plaintiff, Ruth Ann Stedeford;  
24 Plaintiff’s counsel, Jared Anderson, Esq.; and Plaintiff’s designated expert, Thomas A. Jennings  
25 (collectively, “Plaintiff’s group”) entry upon designated land or other property in control of the party  
26 upon whom request is served for the express purposes of inspection, measurement, surveying,  
27 photography, and non-destructive and non-invasive testing of the property, specifically the floor near

1 the self-checkout area upon which Plaintiff allegedly fell on December 11, 2013, and the surrounding  
2 area for a distance of up to ten (10) feet in any or all directions from the location of Plaintiff's alleged  
3 fall, using only manual and visual inspection, measuring and surveying tools, such as a hand-operated  
4 English XL device or similar device to measure coefficient of friction.  
5

6 Members of Plaintiff's group may utilize still photography of the area upon which Plaintiff fell  
7 on December 11, 2013, and the surrounding area for a distance of up to ten (10) feet in any or all  
8 directions from the location of Plaintiff's alleged fall, but may not create a videotape or recording of  
9 any kind. No member of Plaintiff's group shall speak to any member of Walmart personnel during the  
10 inspection.  
11

12 DATED this 26th day of October, 2015.  
13

14 **INJURY LAWYERS OF NEVADA**

15 /s/ Jared Anderson  
16 JARED ANDERSON, ESQ.  
Nevada Bar No. 9747  
17 6900 Westcliff Drive, Suite 707  
Las Vegas, Nevada 89145  
18 (702)868-8888

19 *Attorneys for Plaintiff*  
20 *Ruth Ann Stedeford*

12 DATED this 26th day of October, 2015.  
13

14 **PHILLIPS, SPALLAS & ANGSTADT LLC**

15 /s/ Timothy J. Lepore  
16 TIMOTHY J. LEPORE  
Nevada Bar No. 13908  
17 504 South Ninth Street  
Las Vegas, Nevada 89101  
18 (702) 938-1510

19 *Attorneys for Defendant*  
20 *Wal-Mart Stores, Inc.*

21  
22 IT IS SO ORDERED.  
23

24 DATED this 2nd day of November, 2015.  
25

26   
27  
28 UNITED STATES MAGISTRATE JUDGE